

DOCKET SECTION

BEFORE THE

**POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

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U.S. DEPARTMENT OF JUSTICE
GENERAL INVESTIGATIVE DIVISION

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**DOUGLAS F. CARLSON
NOTICE OF FILING
OF REVISED RESPONSE TO
INTERROGATORY USPS/DFC-T1-13**

February 6, 1998

I, Douglas F. Carlson, hereby provide notice of the filing of a revised response to USPS/DFC-T1-13.

Respectfully submitted,



Dated: February 6, 1998

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and section 3(B) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

February 6, 1998
Emeryville, California

**DOUGLAS F. CARLSON RESPONSES TO
INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

USPS/DFC-T1-13. Please refer to your testimony at page 17, line 22 through page 18, line 11. Is it your understanding that the three characteristics presented on page 18 represent an exhaustive list of the reasons why customers might prefer return receipt service to the hypothetical alternative presented by you on page 17, lines 25 to 26, of your testimony? Please explain your answer.

RESPONSE:

No. These three characteristics are elements of the service that, according to witness Plunkett, contribute to the value of return-receipt service. I agree with witness Plunkett. Moreover, I agree with his implication that these three characteristics are very important in distinguishing my hypothetical alternative from the Postal Service's return-receipt service as the service is described in DMM § D042.1.7. In fact, I believe that these characteristics are the *key* characteristics that distinguish my hypothetical alternative from return-receipt service as the service is described in DMM § D042.1.7. I designed the hypothetical alternative in DFC/USPS-T40-1 and the follow-up interrogatories thereto to learn the reasons why the Postal Service believes that return-receipt service, for which customers must pay \$1.10, would be better than my hypothetical alternative, which would cost 20 cents.

Witness Plunkett also wrote, "Furthermore, option 2 places greater demands upon the recipient for the provision of information. Senders who place a high value upon the time of the recipient, or who merely wish not to inconvenience the recipient would undoubtedly value option 1 more highly." Tr. 3/849. Witness Plunkett's assertion is dubious, however, because the need to visit the service window at a post office to sign for a piece of certified mail, or the need to answer the doorbell when the letter carrier arrives and sign for mail at the doorstep, is likely, in most cases, to impose a significantly greater burden on a recipient than my hypothetical option (2).

While I do not believe that this list of four characteristics is exhaustive, DFC/USPS-T40-1(c) did ask witness Plunkett to explain "*all* differences between option (1) and option (2) that might make option (1) more valuable than option (2)" [emphasis added]. Witness Plunkett filed this interrogatory response with a declaration under penalty of perjury that his answer was "true and correct, to the best of [his] knowledge, information, and belief," so these three characteristics, plus the unpersuasive fourth characteristic, are the only ones that the Postal Service should be citing in this case as distinguishing return-receipt service from my hypothetical alternative.

I am aware of at least one additional distinguishing characteristic. DMM § D042.1.7(b), if followed, would prevent the recipient from opening the envelope until

**DOUGLAS F. CARLSON RESPONSES TO
INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

the recipient had signed and printed his/her name on the return receipt and handed the return receipt back to the USPS employee. Of course, this procedure is not followed in the instances described in my testimony, so once again return-receipt service loses an element of value that would distinguish it from my 20-cent alternative.

DECLARATION

I, Douglas F. Carlson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Dated: February 6, 1998

A handwritten signature in cursive script, appearing to read "Douglas F. Carlson", written over a horizontal line.

DOUGLAS F. CARLSON